

From: [Zachery Darnell](#)
To: [scott](#); [Daniel Barham](#); [Hestin, Nellie E.](#)
Cc: [Shaw, Jarrod D.](#); [Scott Maucere](#); [pSmalto](#); [Sarah Cofer](#)
Subject: Vimala LLC v Wells Fargo et al
Date: Wednesday, September 7, 2022 4:09:50 PM
Attachments: [sales 2017-01-01-2017-09-30-9102.xlsx](#)
[sales 2017-01-01-2017-09-30-1222.xlsx](#)
[sales 2017-01-01-2017-09-30-1622.xlsx](#)

Mr. Cooper,

This email is in response to your request for additional information during our preliminary call on August 30, 2022. Attached are three Microsoft Excel Spreadsheets that were combined to make Exhibit 6 to the Complaint. Next, you asked for an explanation of Vimala LLC's order system, specifically the "split pay" system. Ms. Venkataraman explains the system in her August 24, 2020 deposition which has previously been provided to you. Specifically she discusses this beginning on page 96:17; 103:22; 183:20; and 185:13. If you have any questions about the system or need additional explanation, I am happy to do so. Finally, you requested the production dates of the emails in this matter. Those production dates are: On January 23, 2020, several hundred emails were produced in response to discovery requests. Next, on June 1, 2020, emails were produced, then on March 26, 2021, we provided "clean copies" of the emails in question, that were taken directly from Google by Mr. Lanterman. We made multiple productions of emails because first we received copies of emails Ms. Venkataraman had forwarded to herself to save as her email servers were being shut down, next we were able to recover .olk versions of emails that were "recovered" and converted back to emails, which were then produced, and finally we were able to reinstitute some of Vimala, LLC's old admin email accounts and recover native emails directly from Google.

If you have any other questions or need additional information, please do not hesitate to contact me. Thanks."

Sincerely,

Zachery S. Darnell, Esq.
Licensed in TN and FL
Zachery@B-M.law

Barham & Maucere LLC
6708 Heritage Business CT
Chattanooga, TN 37421
O +1 423.855.1755
Toll Free: 833.77BMLAW

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